

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
SOUTHEASTERN DIVISION

YANIRA ARELI GOMEZ, on behalf of )  
herself and others similarly situated, )

Plaintiff, )

v. )

Case No. 1:25-cv-00108 ACL

SOUTHEAST HOSPITAL, )

Defendant. )

**DEFENDANT’S UNOPPOSED MOTION FOR EXTENSION OF TIME  
TO RESPOND TO PLAINTIFF’S COMPLAINT**

Defendant Southeast Hospital moves for an extension of time, from July 24, 2025, to August 21, 2025 (28 days), to respond to Plaintiff Yanira Areli Gomez’s complaint. In support of this unopposed motion, Defendant states:

1. Plaintiff filed her complaint on June 13, 2025.
2. Defendant was served with a summons and the complaint on July 3, 2025.
3. Under Rule 12(a)(1)(A)(i), Defendant’s response to the complaint is currently due by July 24, 2025.
4. The undersigned counsel was recently retained to represent Defendant and respectfully requests an additional 28 days—until August 21, 2025—for Defendant to respond to the complaint so that counsel may investigate and analyze the complaint and prepare an appropriate response.

5. Plaintiff's counsel, Anthony Paronich, has advised that Plaintiff does not oppose the requested extension of time. The requested extension of time will not prejudice Plaintiff and will not unduly delay this litigation.

6. This is the first request by Defendant seeking such an extension.

Respectfully submitted,

THOMPSON COBURN LLP

By /s/ Jeffrey R. Fink

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